

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACOB BARTON,

Petitioner,

v.

BO ZHANG, HARVES BRIDGE LLC, BEIJING
SHENGPURUISI INTERNATIONAL SPORTS CO.,
LTD.,

Respondents.

Case No. 23-cv-8536 (LJL)

**NOTICE OF PETITIONER'S MOTION FOR
SUMMARY JUDGMENT AGAINST RESPONDENT BO ZHANG**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the entire record herein, Petitioner Jacob Barton hereby moves the Court for an order entering summary judgment in his favor against Respondent Bo Zhang pursuant to Federal Rule of Civil Procedure 56.

A Proposed Order is attached as Exhibit A.

Dated: February 6, 2024
New York, NY

Respectfully submitted,

/s/ Andrew Chan Wolinsky

Andrew Chan Wolinsky

Yavar Bathaee

Bathaee Dunne LLP

445 Park Ave, 9th Floor

New York, NY 10022

Tel: (332) 208-7337

awolinsky@bathaeedunne.com

yavar@bathaeedunne.com

Attorneys for Petitioner

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

The Court will hold a telephonic conference on this matter on March 22, 2024 at 12:00 PM, at which Petitioner should be prepared to address: (i) the basis for personal jurisdiction over the Respondent; (ii) whether venue is proper in the Southern District of New York; and (iii) why Petitioner did not file the arbitration agreement or state in the Rule 56.1 statement either the language of the arbitration agreement and the basis for believing that the dispute fell within the scope of the arbitration agreement, or set forth in the Rule 56.1 statement a summary of the evidence before the arbitral panel that would support its award. Parties are directed to dial into the Court's teleconference number at 888-251-2909, Access Code 2123101, and follow the prompts. Petitioner is directed to serve this Order on Respondent Zhang and to file proof of service on the docket.

March 11, 2024

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACOB BARTON,

Petitioner,

v.

BO ZHANG, HARVES BRIDGE LLC, BEIJING
SHENGPURUISI INTERNATIONAL SPORTS CO.,
LTD.,

Respondents.

Case No. 23-cv-8536 (LJL)

[PROPOSED] ORDER

Upon Petitioner's motion for an order for summary judgment in his favor against Respondent Bo Zhang and the entire record in this proceeding,

IT IS HEREBY ORDERED that, sufficient cause having been shown, Petitioner's motion for an order for summary judgment is GRANTED.

SO ORDERED this _____ day of _____, 2024.

Hon. Lewis J. Liman
United States District Judge